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Attorneys for Defendants
ROCKLIN U.S.D., PLACER COUNTY SELPA, KRISTI GREGERSEN,
TROY TICKLE, KRISTAIN ROYER & BETH DAVIDSON

THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

Louie Andres MARQUES, Gloria V.M.,)	Case No. 2:22–CV–00150–TLN–KJN
Thomas V.M., and Jordan V.M.,)	
)	STIPULATION REGARDING FURTHER
Plaintiffs,)	EXTENSION OF DEFENDANTS’ TIME
)	TO RESPOND TO THE SECOND
vs.)	AMENDED COMPLAINT; ORDER
)	
GUIDING HANDS SCHOOL, Inc., et al.,)	
)	
Defendants,)	
)	
)	

Plaintiffs Gloria V.M., Thomas V.M., and Jordan V.M., and Defendants, ROCKLIN UNIFIED SCHOOL DISTRICT, PLACER COUNTY SELPA, KRISTI GREGERSEN, TROY TICKLE, KRISTAIN ROYER, and BETH DAVIDSON, by and through their attorneys of record, pursuant to Fed. R. Civ. P. 6 and 83 and Local Rules 143 and 144, hereby stipulate as follows: These Defendants may have a further extension of time to respond to the Plaintiffs’ Second Amended Complaint, as set forth below.

Good cause exists for the requested relief, as follows:

STIPULATION REGARDING FURTHER EXTENSION OF TIME FOR DEFENDANTS
TO RESPOND TO SECOND AMENDED COMPLAINT

1 On February 14, 2022, this court entered an order (Dkt. 10), pursuant to the parties'
2 stipulation, granting defendants ROCKLIN UNIFIED SCHOOL DISTRICT, PLACER
3 COUNTY SELPA, KRISTI GREGERSEN, TROY TICKLE, KRISTAIN ROYER and BETH
4 DAVIDSON an extension of time to file their response to the Second Amended Complaint
5 (SAC) up to and including March 15, 2022.

6 This case is related to Eastern District of California Case No. 2:20-cv-00635-TLN-KJN
7 (LANGLEY, et al. v. GUIDING HANDS SCHOOL, INC. et al.), in that the plaintiffs have
8 asserted claims against defendants GUIDING HANDS SCHOOL, INC. and POINT QUEST,
9 INC., and their former employees, based on the alleged unlawful use of physical restraints upon
10 the plaintiffs, who were minor students enrolled at one or both schools. A NOTICE of
11 RELATED CASES was filed in the LANGLEY action on January 26, 2022 (Dkt. 224) relating
12 the LANGLEY action to this action, and the court signed a RELATED CASE ORDER on
13 January 31, 2022 (Dkt. 227).

14 There is a pending criminal matter involving the GUIDING HANDS and POINT
15 QUEST defendants related to the subject matter of these related cases. As a result, on March 1,
16 2022, the court entered an order (Dkt. 234) granting the plaintiffs' Motion to Stay Case 2:20-cv-
17 00635 (Dkt. 153).

18 On March 9, 2022, Plaintiffs' counsel herein informed defense counsel that within the
19 next thirty days they intend to file a motion to consolidate this matter with the LANGLEY
20 matter and that they also intend to move to stay this action pending resolution of the criminal
21 matter. The parties agreed that under the circumstances, defendants' time to respond to the
22 SAC should be extended, pending the court's ruling on the motion to consolidate and motion to
23 stay.

24 Accordingly, the parties hereto stipulate that defendants ROCKLIN UNIFIED SCHOOL
25 DISTRICT, PLACER COUNTY SELPA, KRISTI GREGERSEN, TROY TICKLE,
26 KRISTAIN ROYER, and BETH DAVIDSON, should have a further extension of time to file
27 their responsive pleading to the SAC, up to and including the thirtieth day following the court's
28

entry of an order on the plaintiffs' motion to consolidate and motion for a stay, whichever order is entered last.

IT IS SO STIPULATED.

Dated: March 14, 2022

LAW OFFICES OF SETH L. GOLDSTEIN

By /s/
SETH L. GOLDSTEIN,
Lead Counsel for Plaintiffs,
MARQUEZ, GLORIA V.M., THOMAS
V.M. and JORDAN V.M.

Dated: March 14, 2022

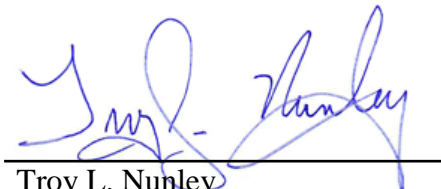
EVANS, WIECKOWSKI, WARD &
SCOFFIELD, LLP

By /s/
Carol A. Wieckowski
Attorney for Defendants
ROCKLIN U.S.D., PLACER COUNTY SELPA,
KRISTI GREGERSEN, TROY TICKLE,
KRISTAIN ROYER & BETH DAVIDSON

ORDER

IT IS SO ORDERED.

Dated: March 15, 2022


Troy L. Nunley
United States District Judge